

**UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**AVI ROBINSON and TIMOTHY
HANNAH,**

Plaintiffs,

v.

Case No. 2:16-cv-11081-LJM-RSW

Hon. Laurie J. Michelson

Hon. R. Steven Whalen, Mag. Judge

**ORGAN PROCUREMENT
AGENCY OF MICHIGAN,** a
Michigan nonprofit corporation.

Defendant.

Maia E. Johnson (P40533)
mjohnson@goldstarlaw.com
Caitlin E. Malhiot (P76606)
cmalhiot@goldstarlaw.com
David A. Hardesty (P38609)
Counsel for Plaintiffs
GOLD STAR LAW, PC
2701 Troy Center Drive, Ste. 400
Troy, MI 48084
Telephone: (248) 275-5200

Robert A. Boonin (P38172)
rboonin@dykema.com
Noah Hurwitz
nhurwitz@dykema.com
Counsel for Defendant Organ
Procurement Agency of Michigan
DYKEMA GOSSETT PLLC
2723 South State Street, Ste. 400
Ann Arbor, MI 48104
Telephone: (734) 214-7650

DEFENDANT'S FIRST WITNESS LIST

Defendants Organ Procurement Agency of Michigan ("Defendant"), by its counsel, Dykema Gossett PLLC, submits the following list of witnesses that it may call at trial:

1. Plaintiff Avi Robinson;

2. Plaintiff Timothy Hannah;
3. Corinne Doran, a current employee of the Defendant;
4. Bruce Nicely, a current employee of the Defendant;
5. Ryan Cormier, a current employee of the Defendant;
6. Amy Olszewski, a current employee of the Defendant;
7. Dana LaPointe-O'Sullivan, a current employee of the Defendant;
8. Diane Hemingway, a current employee of the Defendant;
9. Bill Mastenbrook, a current employee of the Defendant;
10. Marty Mosley, a current employee of the Defendant;
11. Jonathan Caldwell, a current employee of the Defendant;
12. Alex Moldovan, a current employee of the Defendant.
13. Kyle Mavin, a former employee of the Defendant;
14. Melody East, a former employee of the Defendant;
15. Benjamin Kelley, a current employee of the Defendant;
16. Angela Lindeman, a current employee of the Defendant;
17. Kate Ash, a current employee of the Defendant;
18. Antonio Trice, a current employee of the Defendant;
19. Robert Chabie, a current employee of the Defendant;
20. Kris Mavin, a current employee of the Defendant;
21. George Rutledge, a current employee of the Defendant;

22. Chelsea Sneed, a current employee of the Defendant;
23. Cupri Burns, a current employee of the Defendant;
24. Rachel Murphy, a current employee of the Defendant;
25. Ken Seid, a current employee of the Defendant;
26. Any past, present and future Employees, Agents, Representatives and/or Records Keeper(s) of Defendant;
27. Any physicians, and their keeper of records, and all of their present and former nurses, employees and staff who treated or assisted in the care, diagnosis and treatment of, or who had contact with, Plaintiffs;
28. All mental health professionals, counselors, therapists, social workers, or clergy with whom Plaintiffs have spoken regarding issues pertinent to this case, who are at yet unidentified, their keepers of records, and their present and former office and professional staff;
29. Keeper of records of any government agency that has relevance to this case;
30. Keeper of records, any organization that prepared Plaintiffs' income tax returns;
31. All persons deposed or noticed for deposition;
32. All parties, witnesses, and other persons involved with or identified in lawsuits and administrative actions in which Plaintiffs are or were involved;

33. Any past or present employers of Plaintiffs, and all their present and former owners, supervisors, agents and employees who worked with or had contact with Plaintiffs;

34. Any entities which Plaintiffs have sought employment since leaving Defendant's employment, as well as their respective keepers of records;

35. Any other necessary keepers of records;

36. All individuals listed on Plaintiffs' Witness List;

37. Any rebuttal, sur-rebuttal or impeachment witnesses deemed necessary by Defendant; and

38. Defendant reserves the right to amend this list and/or add additional witnesses as this matter progresses.

Respectfully submitted,

DYKEMA GOSSETT PLLC

By: /s/ Robert A. Boonin
Robert A. Boonin (P38172)
Noah S. Hurwitz (P74063)
Attorneys for Defendant
2723 South State Street, Suite 400
Ann Arbor, Michigan 48104
(734) 214-7650
rboonin@dykema.com
nhurwitz@dykema.com

Dated: November 3, 2016

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2016, my assistant electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notice to all attorneys of record.

DYKEMA GOSSETT PLLC

By: /s/ Robert A. Boonin

Robert A. Boonin (P38172)

Noah S. Hurwitz (P74063)

Dykema Gossett PLLC

Attorneys for Defendant

2723 South State Street, Suite 400

Ann Arbor, MI 48104

(734) 214-7662